

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Celine SA, )  
                        )  
                        )  
Plaintiff,         )  
                        ) Civil Action No. 1:24-cv-01854  
v.                     )  
                        ) Judge: Honorable John J. Tharp, Jr.  
The Partnerships and Unincorporated Associations )  
Identified on Schedule A,                             )  
                        )  
Defendants.         )  
                        )  
                        )  
                        )

**MOTION FOR THIRTY DAY EXTENSION OF TIME**

Pursuant to Federal Rules of Civil Procedures, Rule 6 (b)(1)(b), Defendant Kapee, (hereinafter “Kapee”), through its counsel, requests a thirty-day extension of time, i.e., from April 9, 2024 to May 9, 2024, to file its answer and/or otherwise plead.

Kapee’s delay is not intentional and is excusable because of the difficulties in retaining counsel with time zone differences and language barrier. Therefore, Kapee respectfully requests that the Court grants its motion for thirty-day extension of time.

Respectfully submitted,

Dated: April 14, 2024

/s/ Lance Liu

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**ATTORNEY FOR DEFENDANT  
KAPEE**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2024, a true and correct copy of the foregoing document was filed electronically through the Court's CM/ECF system with notice of case activity automatically generated and sent electronically to all counsel of record.

Dated: April 14, 2024

/s/ Lance Liu

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**KAPEE**